

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 05-27 Erie
)
CLARENCE JUANE GAMBILL)

GOVERNMENT'S PROPOSED VOIR DIRE

AND NOW comes the United States of America, by and through its counsel, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Marshall J. Piccinini Assistant United States Attorney for said district, and respectfully requests the following voir dire questions:

1. Have you or has any member of your immediate family ever been charged with a criminal offense (other than traffic violations) or appeared in court as a defendant in a criminal case or as a witness on behalf of a defendant in a criminal case?

If so, would this affect your ability to render a fair and impartial verdict in this case?

2. Do you have such feelings about the United States Government, the criminal justice system or the prosecution of criminal cases that would affect your ability to render a fair and impartial verdict in this case?

3. Are you more likely to believe the testimony of a law enforcement officer, as opposed to the testimony of any other witness, simply and solely because he or she is employed in a law enforcement capacity?

4. Are you less likely to believe the testimony of a law enforcement officer, as opposed to the testimony of any other witness, simply and solely because he or she is employed in a law enforcement capacity?

5. The government expects that cooperating witnesses will testify in this case. If you heard evidence that one or more of these witnesses entered into a plea agreement with the government, would you disregard or reject the testimony of that witness?

6. The government expects that there will be evidence that one or more of the government's witnesses has a prior record. Would that fact cause you to disregard or reject the testimony of any such witness?

7. Are any of you opposed to the government enforcing federal drug laws?

8. Do you or any members of your immediate family belong to any organizations that advocate the legalization of drugs?

Respectfully submitted,

MARY BETH BUCHANAN
United States Attorney

/s/ Christian A. Trabold for
MARSHALL J. PICCININI
Assistant U.S. Attorney
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